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*Attorneys for Defendant Western Range Association*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**CIRILO UCHARIMA ALVARADO**, on behalf of  
himself and all others similarly situated;

*Plaintiff,*

v.

**WESTERN RANGE ASSOCIATION**, a  
California non-profit corporation; **ELLISONz**  
**RANCHING COMPANY**, a Nevada corporation;  
**JOHN ESPIL SHEEP CO., INC.**, a Nevada  
corporation; **F.I.M. CORP.**, a Nevada corporation;  
**THE LITTLE PARIS SHEEP COMPANY,**  
**LLC**, a Nevada limited liability company;  
**BORDA LAND & SHEEP COMPANY, LLC**, a

Case No. 3:22-cv-00249-MMD-CLB

**ORDER GRANTING JOINT  
MOTION TO EXTEND TIME FOR  
PLAINTIFF TO FILE AMENDED  
COMPLAINT**

Nevada limited liability company; **HOLLAND RANCH, LLC**, a Nevada limited liability company; **NEED MORE SHEEP CO., LLC**, a Nevada limited liability company; and **FAULKNER LAND AND LIVESTOCK COMPANY, INC.**, an Idaho corporation,

*Defendants.*

Plaintiff Cirilo Ucharima Alvarado (“Plaintiff”) and Defendant Western Range Association (“WRA”), by and through their respective counsel, respectfully submit this joint motion asking the Court to extend the deadline for Plaintiff to file his amended complaint by two weeks, until September 27, 2024.<sup>1</sup>

The Parties submit that the extension is warranted due to WRA’s discovery on September 10, 2024—less than three days before Plaintiff’s current deadline of September 13, 2024 to amend his complaint—that it had inadvertently failed to produce 117,903 pages of documents from its custodial ESI production. *See* Declaration of Yaman Salahi (“Salahi Decl.”) ¶ 4. The Court previously ordered WRA to complete its ESI production by August 30, 2024, and on August 27, 2024, WRA produced 300,678 pages. *Id.* at ¶ 3. This means that over a quarter of the ESI materials were inadvertently not produced until September 10, 2024. WRA promptly corrected its oversight by making these materials available to Plaintiff on the evening of September 10. *Id.* at ¶ 4. Nevertheless, the Parties agree that the short amount of time between WRA’s production and Plaintiff’s deadline to amend does not afford Plaintiff an opportunity to meaningfully review these materials for purposes of inclusion in the amended complaint. *Id.* at ¶ 5.

For the foregoing reasons, Plaintiff and WRA respectfully request the Court extend by

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<sup>1</sup> Plaintiff requested the Ranch Defendants’ position on this motion before filing. The Ranch Defendants stated that they “preserve their previous objections as stated in ECF 188, 191, 199, and n.1 to 210.” As Plaintiff has previously stated, he does not intend to seek additional discovery from the Ranch Defendants prior to filing an amended complaint.

two weeks Plaintiff's deadline to file an amended complaint, until September 27, 2024. This is the second joint request by Plaintiff and WRA for an extension of time to extend deadlines since the Court's July 19, 2024 order and Plaintiff's fifth request to extend the deadline to amend his complaint, all previous extensions of which were granted due to the pace of discovery production. The parties do not expect that additional extensions will be needed for the amended complaint.

Dated: September 11, 2024

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/s/ Yaman Salahi

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Dated: September 11, 2024

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Association*

**ORDER**

**IT IS SO ORDERED.**

**Dated:** September 11, 2024

  
UNITED STATES MAGISTRATE JUDGE